

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUOSHUI SUN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

TAL EDUCATION GROUP, BANGXIN
ZHANG, RONG LUO and LINDA HE,

Defendants.

Case No.: 1:22-cv-01015-ALC-KHP

**NOTICE OF MOTION TO DISMISS THE COMPLAINT
ON BEHALF OF TAL EDUCATION GROUP**

PLEASE TAKE NOTICE that, upon the Amended Complaint, filed October 19, 2022 (ECF No. 46), the Memorandum of Law dated February 10, 2023, the Declaration of Xiao Liu dated February 10, 2023 and attached exhibits, and upon all prior papers and proceedings herein, Defendant TAL Education Group (“TAL”) will move this Court, before the Honorable Andrew L. Carter, Jr., United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on a date and at a time designated by the Court, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6), and the Private Securities Litigation Reform Act of 1995, for an Order dismissing the claims against TAL in their entirety, with prejudice, and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court-ordered briefing schedule entered January 5, 2023 (ECF No. 60), Plaintiffs’ memorandum of law in opposition, if any, must be served on the undersigned counsel by March 31, 2023.

DATED: New York, New York
February 10, 2023

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

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